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20 UNITED STATES DISTRICT COURT
21 FOR THE NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION

23 AMERICAN FEDERATION OF
24 GOVERNMENT EMPLOYEES, AFL-CIO;
25 AMERICAN FEDERATION OF STATE
26 COUNTY AND MUNICIPAL EMPLOYEES,
27 AFL-CIO; et al.,

28 Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

DECLARATION OF MELISSA PITKIN

Declaration of Melissa Pitkin, No. 3:25-cv-01780-WHA

1 I, Melissa Pitkin, declare the following under penalties of perjury:

2 1. I am over 18 years of age and competent to give this declaration. This declaration is
3 based on my personal knowledge, information, and belief.

4 2. I am the Acting Chief Executive Officer of Point Blue Conservation Science ("Point
5 Blue"), a nonprofit organization founded in 1965 and headquartered in Petaluma, California.

6 3. Point Blue's mission is to conserve birds, other wildlife, and ecosystems through
7 science, partnership, and outreach. Over six decades in conservation, Point Blue has curated long term
8 ecological data sets, honed analytical methods, and built a deeply rooted culture of collaboration to
9 address the significant challenges of our time. Point Blue's 160 scientists are leaders in climate-smart
10 conservation science and are spearheading nature-based solutions to threats to wildlife and our
11 communities. Point Blue's staff are experts in ecology, data management, restoration, evaluating and
12 building solutions to environmental challenges, and more. Point Blue records observations of the
13 natural world using rigorous, standardized protocols and use analyses of these observations to deepen
14 our community's understanding of nature to improve conservation outcomes, partnering with local,
15 state, and federal agencies to implement conservation solutions, including the US Department of
16 Defense, the USDA Natural Resources Conservation Service, NOAA, the National Science
17 Foundation, and the US Fish and Wildlife Service.

18 4. Fourteen of Point Blue's employees are designated as "partner biologists" who have
19 been partially funded through the Natural Resources Conservation Service ("NRCS"), which is a
20 component agency of the United States Department of Agriculture. This program helps private
21 landowners obtain grants to support various conservation practices on their land, including wildlife
22 friendly agriculture and healthy forests and wildfire resilience practices. The Point Blue partner
23 biologists work with landowners to develop their conservation plans and obtain multiple certifications
24 required by NRCS.

25 5. Point Blue has recently learned that multiple employees of NRCS were terminated in
26 February, including soil conservation specialists, range conservation specialists, engineers,
27 archeologists, and administrative staff. The loss of these NRCS staff members directly impacts Point
28 Blue's ability to participate in conservation planning because the lack of staffing causes significant

1 delays on the clearing and implementation of these plans and prevents conservation plans from being
2 certified.

3 6. Point Blue has not been paid for work completed in 2024 and the first quarter of 2025
4 under two valid NRCS agreements. Upon information and belief, the delays in Point Blue's receipt of
5 payment are likely attributable to the staffing cuts at NRCS in their administrative office.

6 7. In addition, the loss of federal employees at other agencies from which Point Blue
7 receives grant funding or partners with, including the National Oceanic and Atmospheric
8 Administration, the Department of Defense, the National Science Foundation, the Forest Service, and
9 the Fish & Wildlife Service is likely to impair grant activities and administration, thereby impairing
10 Point Blue's ability to pursue its conservation work.

11
12 I declare under penalty of perjury under the laws of the United States that the foregoing is true
13 and correct. Executed this 6th day of March in Petaluma, California.

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